## **ALSTON & BIRD**

90 Park Avenue New York, NY 10016 212-210-9400 | Fax: 212-210-9444

Jenny Kramer Direct Dial: 212-210-9420 Email: jenny.kramer@alston.com

June 18, 2025

## **VIA ECF**

Hon. John P. Cronan, U.S.D.J. United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1320 New York, NY 10007 The request is granted. Mr. Dalpour's bail conditions are modified to permit him to travel to Skaneateles, NY, from June 20, 2024 to June 22, 2024,. Mr. Dalpour must provide Pretrial Services with a detailed itinerary prior to that travel.

SO ORDERED June 19, 2025 New York, New York

JOHN P. CRONAN
United States District Judge

Re: United States v. Dalpour, Case No. 1:24-cr-00264-JPC

Dear Judge Cronan,

We write on behalf of Idin Dalpour in the above-captioned matter to respectfully request that the Court enter an order modifying the conditions of Mr. Dalpour's pretrial release to allow him to travel domestically with his family to attend his nieces' graduation. Specifically, Mr. Dalpour respectfully requests the Court's permission to travel to Skaneateles, NY, where he would stay from Friday, June 20, 2024 to Sunday, June 22, 2024, when he will return to his home in New York. While in Skaneateles, he would stay at his brother-in-law's home.

As the Court will recall, Mr. Dalpour was released on May 1, 2024, on a \$500,000 personal recognizance bond, secured by property and co-signed by two financially responsible persons. His travel is restricted to the Southern and Eastern Districts of New York, and he is under supervision by Pretrial Services. Since that time, with the consent of Pretrial Services and government counsel, Mr. Dalpour has twice requested modifications to his conditions of release to allow for travel with his family of a type similar to what he now requests: on May 9, 2024, the Court granted Mr. Dalpour's request to allow him to travel through New Jersey to Warwick, New York, where his family was moving out of a rental home, and to Fairfield, Connecticut from May 10 through May 13, 2024. Likewise, on November 15, 2024, the Court granted Mr. Dalpour's request to travel with his family to Merion Station, Pennsylvania for the Thanksgiving holiday from November 19 to December 1, 2024. On December 19, 2024, the Court granted Mr. Dalpour's request to travel through Connecticut to Massachusetts to stay with his family from December 23 to December 27, 2024. Most recently, on April 1, 2025, the Court granted Mr. Dalpour's request to travel to Pennsylvania to attend a family event from April 4 to April 6, 2025.

Mr. Dalpour is understood to be in full compliance with his conditions of release, and at the conclusion of his prior travels he has reliably returned to his home in New York, just as he would be expected to do on June 22. We have conferred with government counsel and Pretrial Services regarding this request, and both stated that they do not oppose it.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jenny Kramer

Jenny Kramer ALSTON & BIRD LLP 90 Park Avenue New York, NY 10016 (212) 210-9420 Jenny.Kramer@alston.com